

Lincoln Davis Wilson (N.J. Bar No. 02011-2008)

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**Motion for pro hac vice admission filed concurrently*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

**FIRST CHOICE WOMEN'S
RESOURCE CENTERS, INC.**

Plaintiff,

v.

MATTHEW PLATKIN, in his
official capacity as Attorney General
for the State of New Jersey,

Defendant.

Civil Action File No. 3:23-cv-23076

Document Filed Electronically

**DECLARATION OF LINCOLN DAVIS WILSON IN SUPPORT OF
PLAINTIFF’S BRIEF IN SUPPORT OF MOTION FOR TEMPORARY
RESTRAINING ORDER/PRELIMINARY INJUNCTION**

I, Lincoln Davis Wilson, under penalty of perjury do hereby declare as follows:

1. I am an attorney at Alliance Defending Freedom and counsel for Plaintiff First Choice Women’s Resource Centers, Inc. (“First Choice”) in the above-captioned litigation.

2. I submit this Declaration in support of First Choice’s Brief in Support of its Motion for a Temporary Restraining Order/Preliminary Injunction, filed concurrently, and to authenticate and provide to the Court certain documents cited in the same.

3. I have personal knowledge of the facts stated in this Declaration and am competent to testify to the same.

4. Attached as Exhibit 1 is a true and correct copy of an email forwarded from Sundeep Iyer, Director of the New Jersey Division on Civil Rights, to Kaitlyn Wojtowicz, Vice President of Public Affairs at Planned Parenthood Action Fund of New Jersey dated October 17, 2022, obtained in response to an Open Public Records Act request.

5. Attached as Exhibit 2 is a true and correct copy of an email from Kaitlyn Wojtowicz to Sundeep Iyer dated October 26, 2022, obtained in response to an Open Public Records Act request.

6. Attached as Exhibit 3 is a true and correct copy of an email from Sundeep Iyer to Amol Sinha, Executive Director of ACLU New Jersey, dated October 17, 2022, obtained in response to an Open Public Records Act request.

7. Attached as Exhibit 4 is a true and correct copy of an email from Jeanne LoCicero, Legal Director for the ACLU of New Jersey, to Sundeep Iyer and others, dated December 6, 2022, obtained in response to an Open Public Records Act request.

8. Attached as Exhibit 5 is a true and correct copy of an email from Sundeep Iyer to Roxanne Sutocky, Director of Community Engagement for The Women's Centers, dated October 17, 2022, obtained in response to an Open Public Records Act request.

9. Attached as Exhibit 6 is a true and correct copy of emails exchanged between Roxanne Sutocky and Sundeep Iyer, dated October 24, 2022, obtained in response to an Open Public Records Act request.

10. Attached as Exhibit 7 is a true and correct copy of emails exchanged between Sundeep Iyer, Roxanne Sutocky, and others, dated October 26 and December 6, 2022, obtained in response to an Open Public Records Act request.

11. Attached as Exhibit 8 is a true and correct copy of a Subpoena Duces Tecum issued by Attorney General Matthew J. Platkin to First Choice Women's Resource Centers on November 15, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: December 13, 2023

/s/ Lincoln Davis Wilson

Lincoln Davis Wilson